

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA)	
)	Cr. No. 15-10338-FDS
v.)	
)	
OSCAR NOE RECINOS-GARCIA,)	
A/K/A "PSYCHO," ET AL.)	
Defendants.)	

STATUS REPORT REGARDING DISCOVERY

Pursuant to the Court's Order, dated April 27, 2016, the government provides the following status report regarding discovery.

On August 30, 2016, a federal grand jury returned the fourth superseding indictment in this case, adding allegations that six members of MS-13 murdered a 16-year-old, Jose Aguilar-Villanueva, a/k/a "Fantasma," in July 2015. Four of those individuals were previously charged in the racketeering conspiracy. The government is in the process of compiling Global Discovery relating to the new murder, and we expect to produce a substantial amount of the discovery concerning the new murder in the next four to five weeks.

The government provided automatic disclosures on August 19, 2016, along with its most recent Global Discovery production. The government has also provided counsel for the defendants with an updated index summarizing: (i) the dates of each audio/video recording involving CW-1; (ii) the identities of the individuals

that the government has to date identified in the recordings (and in some cases, a brief description of the contents of the recording); (iii) the transcriptions prepared to date, and those that the government is in the process of preparing; (iv) the FBI identification number of the recording; and (v) the Global Discovery production number in which the recording has been produced.

The government has substantially completed its rolling production of pre-indictment discovery, and expects to produce the balance of pre-indictment discovery in its next Global Discovery production. As noted in previous status reports, the government has, and is continuing to produce, certain categories of early Jencks. However, there are certain categories of Jencks that the government cannot disclose at this stage of the case due to safety concerns for witnesses and their respective families. The government intends to produce additional Jencks material after it has taken all reasonable steps to ensure the safety of witnesses and their families--both in the United States and abroad. Finally, the government is continuing to receive additional reports and materials, which the government will produce on a rolling basis.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: /s/ Rachel Y. Hemani
Peter K. Levitt
Christopher Pohl
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Assistant U.S. Attorneys

September 1, 2016

CERTIFICATE OF SERVICE

I, Rachel Y. Hemani, hereby certify that the foregoing was filed through the Electronic Court Filing system and will be sent electronically to the registered participants as identified on the Notice of Electronic Filing.

/s/ Rachel Y. Hemani
Rachel Y. Hemani
Assistant U.S. Attorney

September 1, 2016